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WALTER WILHELM LAW GROUP
A Professional Corporation
Riley C. Walter #91839
Danielle J. Bethel #315945
205 East River Park Circle, Ste. 410
Fresno, CA 93720
Telephone: (559) 435-9800
Facsimile: (559) 435-9868
E-mail: rileywalter@w2lg.com

Attorneys for Tulare Local Healthcare District,
dba Tulare Regional Medical Center

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

TULARE LOCAL HEALTHCARE
DISTRICT, dba TULARE REGIONAL
MEDICAL CENTER,

Debtor.

Tax ID #: 94-6002897
Address: 869 N. Cherry Street
Tulare, CA 93274

CASE NO. 17-13797

DC No.: WW-32

Chapter 9

**EXHIBITS IN SUPPORT OF REPLY OF
DEBTOR TULARE LOCAL
HEALTHCARE DISTRICT TO
OPPOSITION OF HEALTHCARE
CONGLOMERATE ASSOCIATES TO
DEBTOR'S APPLICATION FOR 2004
EXAMINATION AND PRODUCTION OF
DOCUMENTS (JPMORGAN CHASE
BANK, N.A.)**

Date: June 26, 2018
Time: 9:30 a.m.
Place: 2500 Tulare Street
Fresno, CA 93721
Courtroom 13
Judge: Honorable René Lastreto II

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Exhibit	Description	Pages
A	Draft Revised Proposed Order on WW-32	3

Dated: June 19, 2018

WALTER WILHELM LAW GROUP,
a Professional Corporation

By: Riley C. Walter
Riley C. Walter, Attorneys for Debtor,
Tulare Local Healthcare District dba
Tulare Regional Medical Center

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DRAFT

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Tax ID #: 94-6002897
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 Tulare, CA 93274

CASE NO. 17-13797

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DC NO.: WW-32

Date: N/A
 Time: N/A
 Place: 2500 Tulare Street
 Fresno, CA 93721
 Courtroom 13
 Judge: Honorable René Lastreto II

**ORDER GRANTING APPLICATION FOR ORDER AUTHORIZING FRBP 2004
 EXAMINATION AND PRODUCTION OF DOCUMENTS
 (JPMORGAN CHASE BANK, N.A.)**

After reviewing and considering the Application for Ex Parte Order Authorizing
 FRBP 2004 Examination and Production of Documents and good cause appearing,

IT IS HEREBY ORDERED:

1. That applicant Tulare Local Healthcare District ("Applicant") is authorized
 to examine JPMorgan Chase Bank, N.A. pursuant to FRBP 2004(a) on the subjects
 specified in FRBP 2004(b);

2. That pursuant to FRBP 2004(c), attendance for examination and
 production of documentary evidence may be compelled in the manner provided in
 FRBP 9016 for the attendance of witnesses at a hearing or trial;

1 3. Applicant is specifically authorized to compel the production of
2 documents from JPMorgan Chase Bank, N.A. as follows:

- 3 a) All statements for accounts of Tulare Asset Management, LLC
4 including, but not limited to, an account ending in the number 5915
5 held at a branch of JPMorgan Chase Bank located at 5151 W. Goshen
6 Ave., Visalia, California, for the period from October 31, 2016 to the
7 date of this Order;
- 8 b) All documents that refer to, reflect or show sources of funds deposited
9 into accounts of Tulare Asset Management, LLC from October 31,
10 2016 to the date of this Order including, but not limited to, statements,
11 canceled checks, deposits, electronic fund transfers, ACH transfers,
12 and/or wire transfers;
- 13 c) All documents that refer to, reflect or show funds dispersed from
14 accounts of Tulare Asset Management, LLC from October 31, 2016 to
15 the date of this Order including, but not limited to, statements,
16 canceled checks, deposits, electronic fund transfers, ACH transfers,
17 and/or wire transfers; and
- 18 d) All documents that refer to, reflect or show the names, addresses,
19 telephone numbers and bank account information of individuals and/or
20 entities that received funds dispersed from accounts of Tulare Asset
21 Management, LLC from October 31, 2016 to the date of this Order.

22 4. That the examination of the witness shall not be scheduled earlier than
23 10 days after service of this Order or Subpoena for 2004 Examination with Production
24 of Documents, whichever is later, under FRBP 9016.

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DRAFT

Presented by:

Danielle J. Bethel, Attorneys for
Tulare Local Healthcare District, dba
Tulare Regional Medical Center

IT IS SO ORDERED.

Dated: _____, 2018

By:

René Lastreto II, Judge
United States Bankruptcy Court

DRAFT